

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

BRUCE CHARLES, on behalf of himself  
and all other similarly situated prisoners  
at David Wade Correctional Center,

and

THE ADVOCACY CENTER,

PLAINTIFFS,

VS.

JAMES M. LEBLANC, *et al.*,

DEFENDANTS.

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CIVIL ACTION NO.:

5:18-CV-00541-EEF-MLH

JUDGE ELIZABETH E. FOOTE

USMJ MARK L. HORNSBY

CLASS ACTION

**DECLARATION OF KYLE POTTS**

I, Kyle Potts, declare under penalty of perjury that the following is true and correct:

1. My name is Kyle Potts. I am over the age of majority, of sound mind, have never been convicted of a felony offense or a crime of moral turpitude, and am otherwise capable of making this declaration. The statements contained in this affidavit are based upon my personal knowledge. All such statements are true and correct.

2. I am a partner with Adams & Reese and have been with the firm since March 2001.

3. In August 2021, Adams & Reese agreed to assist Disability Rights Louisiana, Bruce Charles, Carlton Turner, Ronald Brooks and Larry Jones in the matter of *Anthony Tellis, et al v. James Leblanc, et al*, USDC Western District of Louisiana, #18-541.

4. In connection with this representation, Adams & Reese agreed to provide pro-bono legal services.

5. Attorneys and staff with Adams & Reese initially provided services in connection with the liability phase of this matter that began on January 10, 2022.

6. In advance of trial, I along with my partner, Liz Roussel, assisted with some trial preparation, strategy and witness preparation. We reviewed voluminous materials relating to the case and prepared for specific witness examinations. Ms. Roussel and I both appeared during the liability phase of this matter.

7. Adams & Reese provided document management and clerical support in connection with this matter where exhibits were electronically stored, and many volumes of exhibits were reproduced and bound.

8. Jenny Schroeder with Adams & Reese provided document management services totaling 9.4 hours.

9. Liz Roussel provided 35.1 hours of legal service at \$415 an hour.

10. I provided 84.7 hours of legal service at \$400 an hour.

11. Adams & Reese provided conference rooms so that the trial could proceed smoothly using our audio and video technology. This was provided for both phases of the trial.

12. Adams & Reese also provided parking free of charge to counsel associated with Disability Rights Louisiana.

13. In connection with some expenses, such as copy costs and reproduction of color documents, Adams & Reese charged and was reimbursed by Disability Rights Louisiana some \$6,296.14.

14. Other than the previously mentioned reimbursement, Adams & Reese did not charge or receive payment for the hours spent on this matter, and did not charge for the use of its audio/visual system and conference room used for trial.

I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct. Signed this 25<sup>th</sup> day of June, 2025.



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KYLE L. POTTS